

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

In re:	)	
	)	
New Beginnings Care, LLC	)	Case No. 16-10272 NWW
Abbeville Healthcare & Rehab, LLC	)	Case No. 16-10273 SDR
Campus Healthcare & Rehab, LLC	)	Case No. 16-10275 SDR
Cedarcreek Healthcare & Rehab, LLC	)	Case No. 16-10276 SDR
Eastman Healthcare & Rehab, LLC	)	Case No. 16-10277 SDR
Edwards Redeemer Healthcare & Rehab, LLC	)	Case No. 16-10278 NWW
Goodwill Healthcare & Rehab, LLC	)	Case No. 16-10279 NWW
Jeffersonville Healthcare & Rehab, LLC	)	Case No. 16-10280 NWW
Mt Pleasant Healthcare & Rehab, LLC	)	Case No. 16-10282 SDR
Oceanside Healthcare & Rehab, LLC	)	Case No. 16-10283 SDR
Pinewood Healthcare & Rehab, LLC	)	Case No. 16-10284 SDR
Rockmart Healthcare & Rehab, LLC	)	Case No. 16-10285 SDR
Savannah Beach Healthcare & Rehab, LLC	)	Case No. 16-10286 SDR
Woodlands Healthcare & Rehab, LLC	)	Case No. 16-10287 SDR
	)	
Debtors.	)	Chapter 11
	)	Jointly Administered Requested

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**DEBTORS' EXPEDITED  
MOTION FOR JOINT ADMINISTRATION PURSUANT TO FEDERAL RULES OF  
BANKRUPTCY PROCEDURE 1015(b)**

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**NOTICE OF HEARING**

Notice is hereby given:

That a hearing will be held in the Third Floor Courtroom A, Historic Post Office and Courthouse, 31 East 11<sup>th</sup> Street, Chattanooga, Tennessee 37402, on January 26, 2016, at 10:00 a.m., on this Motion.

**If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend the hearing, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.**

New Beginnings Care, LLC; Abbeville Healthcare & Rehab, LLC; Campus Healthcare

& Rehab, LLC; Cedarcreek Healthcare & Rehab, LLC; Eastman Healthcare & Rehab, LLC; Edwards Redeemer Healthcare & Rehab, LLC; Goodwill Healthcare & Rehab, LLC; Jeffersonville Healthcare & Rehab, LLC; Mt Pleasant Healthcare & Rehab, LLC; Oceanside Healthcare & Rehab, LLC; Pinewood Healthcare & Rehab, LLC; Rockmart Healthcare & Rehab, LLC; Savannah Beach Healthcare & Rehab, LLC; and Woodlands Healthcare & Rehab, LLC; Debtors and Debtors-in-possession (collectively, the “Debtors”), pursuant to Federal Rule of Bankruptcy Procedure 1015, file this their Expedited Motion for Joint Administration of their Chapter 11 cases and respectfully show the Court as follows:

1. New Beginnings Care, LLC, (“New Beginnings”) filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) on January 22, 2016. New Beginnings remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

2. Abbeville Healthcare & Rehab, LLC, (“Abbeville”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Abbeville remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

3. Campus Healthcare & Rehab, LLC, (“Campus”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Campus remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

4. Cedarcreek Healthcare & Rehab, LLC, (“Cedarcreek”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Cedarcreek remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

5. Eastman Healthcare & Rehab, LLC, (“Eastman”) filed its voluntary petition

for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Eastman remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

6. Edwards Redeemer Healthcare & Rehab, LLC, (“Edwards”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Edwards remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

7. Goodwill Healthcare & Rehab, LLC, (“Goodwill”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Goodwill remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

8. Jeffersonville Healthcare & Rehab, LLC, (“Jeffersonville”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Jeffersonville remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

9. Mt Pleasant Healthcare & Rehab, LLC, (“Mt Pleasant”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Mt Pleasant remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

10. Oceanside Healthcare & Rehab, LLC, (“Oceanside”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Oceanside remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

11. Pinewood Healthcare & Rehab, LLC, (“Pinewood”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Pinewood remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

12. Rockmart Healthcare & Rehab, LLC, (“Rockmart”) filed its voluntary petition

for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Rockmart remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

13. Savannah Beach Healthcare & Rehab, LLC, (“Savannah”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Savannah remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

14. Woodlands Healthcare & Rehab, LLC, (“Woodlands”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code on January 22, 2016. Woodlands remains in possession and control of its estate pursuant to 11 U.S.C. §§1107 and 1108.

15. New Beginnings and Abbeville, Campus, Cedarcreek, Eastman, Edwards, Goodwill, Jeffersonville, Mt Pleasant, Oceanside, Pinewood, Rockmart, Savannah, and Woodlands are “related” within the meaning of Federal Rules of Bankruptcy Procedure 1015(b). New Beginnings and Abbeville, Campus, Cedarcreek, Eastman, Edwards, Goodwill, Jeffersonville, Mt Pleasant, Oceanside, Pinewood, Rockmart, Savannah, and Woodlands are sister companies, and are all Tennessee limited liabilities companies owned by Debbie Jones (50%) and Trent Tolbert (50%).

16. The lead case has been assigned to the Honorable Nicholas W. Whittenburg.

17. The Debtors request that their bankruptcy cases be jointly administered by the Court such that a single docket is utilized for matters relating to the administration of the estates. The Debtors request that separate files be maintained for proofs of claim.

18. The proposed style of the procedurally consolidated cases is as follows:

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

In re	)	
	)	Jointly Administered Under
New Beginnings Care, LLC, et. al.,	)	Case No. 16-10272 NWW
	)	
Debtors.	)	Chapter 11

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19. The Debtors request that all pleadings, notices, orders or other papers, other than proofs of claim, for either of the Debtors be filed in a single original and entered on a single docket, under the Case Number assigned for New Beginnings.

20. The Debtors do not request substantive consolidation.

21. The Debtors are not aware of any administrative or scheduling orders entered in any of the cases which would require modification.

22. The Debtors believe that creditors of the estates will not be prejudiced by joint administration of these cases, that joint administration will not create any conflict of interest in the cases, and that such administration is in the best interests of all creditors and parties in interest because it will reduce the costs of administration.

WHEREFORE, the Debtors request that for ease of administration, convenience and economy, the Court enter an order for the joint administration of these cases, and provide such other and further relief as may be just and proper.

This 24th day of January, 2016.

SCARBOROUGH & FULTON

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this Motion was served in order of preference by email, fax or overnight delivery with sufficient postage to carry it to its destination, dated this 24th day of January, 2016.

United States Trustee  
[Ustregion08.cn.ecf@usdoj.gov](mailto:Ustregion08.cn.ecf@usdoj.gov)

U.S. Attorney  
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30 Largest Unsecured Creditors

Gemino Healthcare Finance  
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By: /s/David J. Fulton  
David J. Fulton